



April 4, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture, Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-SM
1400 Independence Avenue, SW
Washington, D.C. 20250-0249

Re: Comments of Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

I am writing in response to your request for comments on the U.S. Department of Agriculture's (USDA's) "Guidelines for the Interim Voluntary Country of Origin Labeling of Beef, Lamb, Pork, Fish, Perishable Agricultural Commodities, and Peanuts".

I am the President of an independent grocery operation in Northern California which includes three stores. I have been involved in the industry for over 40 years, and am very concerned that the current proposed regulations will not allow us to continue to provide our customers with a fresh and abundant supply of food products.

The law holds retailers responsible for informing consumers of the country of origin of all non-processed beef, pork, lamb, fresh and frozen fruits and vegetables, fresh and frozen seafood (for which we must also identify the method of production), and peanuts that are sold in our retail stores. Only our suppliers know the country of origin of these products. I cannot look at a hand of bananas and know whether it is from Costa Rica or Guatemala. I cannot look at a pound of shrimp and know whether it was farm-raised or wild-caught. USDA must issue regulations that will hold suppliers responsible for giving me complete, accurate and verifiable information.

The requirement to keep two years of records at every retail operation on the country of origin of every covered commodity is outrageous. As a relatively small retailer, we do not have the physical or electronic storage capacity to store such records. Please issue clear and reasonable regulations quickly that will allow us to comply with the law without putting us out of business.

Very truly yours,

R.F. Sercu, President